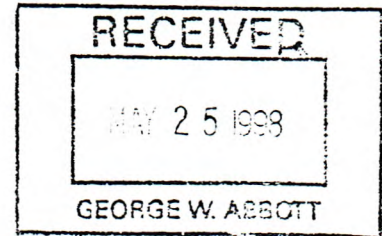


N. PATRICK FLANAGAN (NB 952)
 HALE, LANE, PEEK, DENNISON,
 HOWARD, ANDERSON & PEARL
 100 W. Liberty Street, 10th Floor
 Reno, Nevada 89505
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Attorneys for Defendants

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

GERALD ARMSTRONG,

Plaintiff,

v.

CATHY NORMAN, et al.

Defendants.

Civ. No. 97/00670 - ECR (RAM)

DECLARATION OF DEFENDANT CATHY NORMAN

I, Cathy Norman, declare as follows:

1. I live and reside in Austin, Texas. I have been a resident and domiciliary of Texas my entire life, for over forty years.

2. I am the Director of Special Affairs of the Church of Scientology of Texas, which is located in Austin, Texas. I am also a Director and the Secretary of the Church. I have personal knowledge of the facts set forth in this declaration, and am competent to testify to them.

3. I never have been in the State of Nevada in my adult life, except perhaps

passing through an airport on my way to another destination. I own no real or personal property located in the State of Nevada, have no bank accounts in Nevada, and have never done or conducted any business in Nevada.

4. On May 13, 1998, a process server left a copy of the complaint in this case and of a summons, addressed to me in my personal capacity, with the receptionist at the Church of Scientology of Texas in Austin.

5. The complaint alleges that I sent a certain written communication to a person identified as Craig Branch of Birmingham, Alabama on October 21, 1996. It contains no allegation that I ever sent any communication to anybody in Nevada.

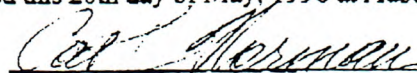
6. Other than returning a phone call to Mr. Armstrong's attorney in this matter, I never have communicated about Mr. Armstrong with any person in Nevada, and never have sent any written materials of the kind or nature alleged in the complaint, or of any kind or nature of or concerning Mr. Armstrong, to any entity or person in Nevada.

7. CST is a Texas corporation with its principal place of business in Texas.

8. CST has no offices or subsidiaries in Nevada. It is not qualified to do business in Nevada, and it does not conduct business in Nevada.

9. CST owns no real or personal property in Nevada, has no bank accounts in Nevada, has no employees in Nevada, and has no direct or indirect contact with Nevada.

I declare under penalty of perjury of the laws of the United States and of the State of Texas that the foregoing is true and correct. Executed this 20th day of May, 1998 at Austin, Texas.


Cathy Norman

100 West Liberty Street, 10th Floor
Reno, Nevada 89501

PROOF OF SERVICE BY MAIL

I, NIKKI G. GROVES, declare:


I am employed in the City of Reno, County of Washoe, State of Nevada by the law offices of Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl. My business address is 100 W. Liberty Street, Tenth Floor, Reno, Nevada 89501. I am over the age of 18 years and not a party to this action.

I am readily familiar with Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl's practice for collection and processing of its outgoing mail with the United States Postal Service. Such practice in the ordinary course of business provides for the deposit of all outgoing mail with the United States Postal Service on the same day it is collected and processed for mailing.

On May 20, 1998, I served the foregoing **MOTION OF DEFENDANTS CHURCH OF SCIENTOLOGY OF TEXAS AND CATHY NORMAN TO DISMISS COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION; LACK OF PERSONAL JURISDICTION; IMPROPER VENUE; AND BECAUSE PLAINTIFF IS A FUGITIVE FROM JUSTICE** by placing a true copy thereof in Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl's outgoing mail in a sealed envelope, addressed as follows:

George W. Abbott, Esquire
George W. Abbott, Chtd.
2245 B Meridian Boulevard
P.O. Box 98
Minden, Nevada 89423

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on May 20, 1998.



NIKKI G. GROVES